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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

MM Docket No. 93-69

In the Matter of

Amendment of Section 73.202(b),  
Table of Allotments,  
FM Broadcast Station.  
(San Carlos and Oracle, Arizona)

RM-8106

COUNTER PROPOSAL OF  
GOLDEN STATE BROADCASTING CORPORATION  
AND RESPONSE TO ORDER TO SHOW CAUSE

Golden State Broadcasting Corporation ("Golden State"),  
through counsel and pursuant to Sections 1.87 and 1.420 of the  
Commission's Rules, hereby files its counter-proposal and

response to Order to Show Cause with respect to the Petition for

spectrum. Furthermore, Desert West's assertions regarding the limited size of its City of License and need for enhanced coverage for economic viability are equally true as to Golden State.

Upgrade of Channel 276C2 at Oracle is fully consistent with the Commission's Rules, as set forth in the annexed Engineering Report of Hatfield & Dawson. The long-unused allotment of Channel 276A at Comobabi, Arizona can be replaced with Channel 275A or 277A. The long-unused allotment of Channel 276B at Cananea, Mexico, one of six long-unused allotments in that small community, is unlikely to inhibit Mexican concurrence with this proposal.

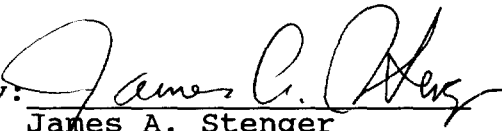
Moreover, consideration of the Desert West petition and termination of this proceeding is conditioned upon the adoption of a working arrangement to implement the 1992 U.S./Mexico FM Broadcast Agreement. Order to Show Cause at note 4. Border area broadcasters including Golden State reasonably expect that this working arrangement will address issues with respect to long-unused allotments, including those at Cananea, Mexico affecting the Tucson, Arizona area. Accordingly, resolution of this proceeding appropriately is conditioned upon further negotiations with respect to the working arrangement.

WHEREFORE, for the foregoing reasons, Golden State respectfully counter-proposes continuing the substitution of Channel 276C2 for Channel 276A at Oracle, Arizona and the continued assignment of that Channel to Golden State, rather than

Desert West, and the substitution of Channel 275A or 277A for  
Channel 276A at Comobabi, Arizona.

Respectfully submitted,

GOLDEN STATE BROADCASTING  
CORPORATION

By:   
James A. Stenger

ROSS & HARDIES  
888 Sixteenth Street, N.W.  
Washington, D.C. 20006

(202) 296-8600

JAMES B. HATFIELD, PE  
BENJAMIN F. DAWSON III, PE  
THOMAS M. ECKELS, PE

PAUL W. LEONARD, PE  
L.S. CHRISTIANE ENSLOW  
STEPHEN S. LOCKWOOD, EIT

HATFIELD & DAWSON  
CONSULTING ELECTRICAL ENGINEERS  
4226 SIXTH AVE. N.W.  
SEATTLE, WASHINGTON 98107

TELEPHONE  
(206) 783-9151  
FACSIMILE  
(206) 789-9834

MAURY L. HATFIELD, PE  
CONSULTANT  
Box 1326  
ALICE SPRINGS, NT 5950  
AUSTRALIA

## ENGINEERING REPORT:

PETITION FOR RULEMAKING TO  
AMEND SECTION 73.202 OF THE RULES  
AND REGULATIONS OF THE FEDERAL  
COMMUNICATIONS COMMISSION

WITH RESPECT TO KLQB  
FM CHANNEL 276C2 AT  
ORACLE, ARIZONA

GOLDEN STATE BROADCASTING CORPORATION

This Engineering Statement has been prepared on behalf of Golden State Broadcasting Corporation, in support of a Petition for Rulemaking to change the class of the Oracle, Arizona FM channel allotment in use by station KLQB as listed in §73.202 of the Commission's Rules.

It is proposed to revise §73.202 to specify channel 276C2 rather than channel 276A. As outlined in the attached channel study, channel 276C2 can be assigned for use at Oracle in complete compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, except as noted in this report. The site used for this study is the present site of KLQB. City grade coverage of the city of Oracle with the use of class C2 facilities from the proposed site will be provided, since the present 3 kw equivalent class A station provides such coverage from the same site.

The attached channel study (Exhibit 1) shows that to accommodate this proposal, a pending rulemaking to change the allotment at San Carlos, CA (NPRM, MM Docket 93-69) from channel 279 A to channel 276C2 must be denied. A substitute channel for the unused class A allotment at Comobabi must be provided. Assuming that the as-yet unreleased revisions of the FM Agreement with Mexico use the same spacing standards as the U.S. domestic area, either

This Engineering Statement supporting a Petition for Rulemaking to change the Table of Allotments (§73.202), has been prepared on behalf of Golden State Broadcasting Corporation, licensee of FM station KLQB. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson, Consulting Engineers, and am Registered as a Professional Engineer in the States of California and Washington.



May 18, 1993

# EXHIBIT 1

Hatfield & Dawson  
Consulting Engineers  
Seattle, Washington

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## FM SEPARATION STUDY

Job Title :Oracle as a Class C-2

Separation Buffer 100 km

FCC DB Date : 03/30/93

Channel 276C2 (103.1 MHz)

Coordinates : 32-37-07 110-47-20

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KNIXFM LIC	Phoenix AZ	BMLH870814KA	273C 102.5	100. 494.0	33-19-58 112-03-53	304.1	143.18 38.18	105 CLEAR
XHQTFM	Nogales SO		274B 102.7	4.0 .0	31-19-50 110-56-40	185.9	143.59 78.59	65 CLEAR
KNFTFM LIC	Bayard NM	BLH890726KD	275C1 102.9	26.0 491.0	32-51-45 108-14-29	82.8	240.30 82.30	158 CLEAR
KQST CP	Sedona AZ	BPH8804191C	275C 102.9	100. 435.0	34-58-07 111-30-28	345.9	269.02 81.02	188 CLEAR
From Channel 261A per D87-76								
KLQB LIC	Oracle AZ	BLH900809KC	276A 103.1	0.9 153.0	32-37-07 110-47-20	.0	.00 -166.00	166 SHORT
KLQB PDEL	Oracle AZ	RM8106	276A 103.1	.0	32-37-07 110-47-20	.0	.00 -166.00	166 SHORT
PADD	San Carlos AZ	RM8106	276C2 103.1	.0	33-23-13 110-44-25	3.0	85.34 -104.66	190 SHORT
ALC	Comobabi AZ	Docket82-127	276A 103.1	.0	32-03-24 111-48-06	237.0	113.92 -52.08	166 SHORT
First Come/First Served Allotment EFFECTIVE 9-20-82								
K276BZ LIC	Sunflower, etc. AZ	BLFT850611TA	276D 103.1	.020 1310.0	33-54-12 111-25-39	337.6	154.42 .00	0 TRANS
TRANSLATOR FOR KKJJ, PAYSON, AZ.								
	Cananea SO		276B 103.1	.0	30-58-57 110-18-01	165.6	187.23 -52.77	240 SHORT
XHRZFM	Nogales SO		278B 103.5	1.95 .0	31-19-50 110-56-55	186.0	143.63 78.63	65 CLEAR
KCWB CPM	Glendale AZ	BMPH8902101C	278C 103.5	52. 740.0	33-35-30 112-34-55	303.4	199.16 94.16	105 CLEAR
KLQB PADD	Oracle AZ	RM8106	279A 103.7	.0	32-37-07 110-47-20	.0	.00 -55.00	55 SHORT
Mexico								

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Consulting Engineers  
Seattle, Washington

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FM SEPARATION STUDY

Job Title :Oracle as a Class C-2

Separation Buffer 100 km

FCC DB Date : 03/30/93

Channel 276C2 (103.1 MHz)

Coordinates : 32-37-07 110-47-20

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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	San Carlos		279A		33-23-13	3.0	85.34	55
PDEL	AZ	RM8106	103.7	.0	110-44-25		30.34	CLEAR

KOYF	San Carlos		279A	6.0	33-23-13	3.0	85.34	55
CP	AZ	BPH910516ML	103.7	66.0	110-44-25		30.34	CLEAR

Proposed to Mexico as Class B-Accepted by Mexico 910313

\*\* End of separation study for channel 276C2 \*\*



# EXHIBIT 2

Hatfield & Dawson  
Consulting Engineers  
Seattle, Washington

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## FM SEPARATION STUDY

Job Title :Substitute for Comobabi Separation Buffer 100 km  
FCC DB Date : 03/30/93  
Channel 275A (102.9 MHz) Coordinates : 32-03-24 111-48-06

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KTZN LIC	Green Valley AZ	BLH911118KA	221C2 92.1	50. 150.0	32-00-11 110-47-49	93.3 SS	95.11 80.11	15 CLEAR
K272DC LIC	Oro Valley AZ	BLFT890731TB	272D 102.3	.049 DA 1645.0	32-26-29 110-46-57	65.7	105.10 .00	0 TRANS
KNIXFM LIC	Phoenix AZ	BMLH870814KA	273C 102.5	100. 494.0	33-19-58 112-03-53	350.2	143.66 48.66	95 CLEAR
XHQTFM	Nogales SO		274B 102.7	4.0 .0	31-19-50 110-56-40	134.6	114.41 -55.59	170 SHORT
	El Golfo SO		275B 102.9	.0	31-41-00 114-29-35	261.4	258.02 18.02	240 CLEAR
KQST CP	Sedona AZ	BPH880419IC	275C 102.9	100. 435.0	34-58-07 111-30-28	4.7	324.12 98.12	226 CLEAR
	From Channel 261A per D87-76							
ALC	Comobabi AZ	Docket82-127	276A 103.1	.0	32-03-24 111-48-06	.0	.00 -72.00	72 SHORT
	First Come/First Served Allotment EFFECTIVE 9-20-82							
KLQB LIC	Oracle AZ	BLH900809KC	276A 103.1	0.9 153.0	32-37-07 110-47-20	56.4	113.92 41.92	72 CLEAR
KLQB PDEL	Oracle AZ	RM8106	276A 103.1	.0	32-37-07 110-47-20	56.4	113.92 41.92	72 CLEAR
PADD	San Carlos AZ	RM8106	276C2 103.1	.0	33-23-13 110-44-25	33.6	177.95 71.95	106 CLEAR
	Cananea SO		276B 103.1	.0	30-58-57 110-18-01	129.6	185.81 15.81	170 CLOSE
	Puerto Lobos SO		277B 103.3	.0	30-16-00 112-49-35	206.4	221.20 156.20	65 CLEAR
XHRZFM	Nogales SO		278B 103.5	1.95 .0	31-19-50 110-56-55	134.8	114.13 49.13	65 CLEAR
KCWB CPM	Glendale AZ	BMPH890210IC	278C 103.5	52. 740.0	33-35-30 112-34-55	337.1	185.26 90.26	95 CLEAR

\*\* End of separation study for channel 275A \*\*

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Consulting Engineers  
Seattle, Washington

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FM SEPARATION STUDY

Job Title :Substitute for Comobabi

Separation Buffer 100 km

FCC DB Date : 03/30/93

Channel 277A (103.3 MHz)

Coordinates : 32-03-24 111-48-06

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
XHQTFM	Nogales		274B	4.0	31-19-50	134.6	114.41	65
	SO		102.7	.0	110-56-40		49.41	CLEAR
	El Golfo		275B		31-41-00	261.4	258.02	65
	SO		102.9	.0	114-29-35		193.02	CLEAR
	Comobabi		276A		32-03-24	.0	.00	72
ALC	AZ Docket82-127		103.1	.0	111-48-06		-72.00	SHORT

~~First Come/First Served Allocation~~

FM SEPARATION STUDY

Job Title :Substitute for Comobabi                      Separation Buffer 100 km  
FCC DB Date : 03/30/93  
Channel 277A (103.3 MHz)                      Coordinates : 32-03-24 111-48-06

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
K280CE LIC	South Tucson, etc. AZ	280D BLFT880126TA	103.9	.033 DA 86.0	32-07-41 110-55-50	84.2	82.62 .00	0 TRANS
TRANSLATOR FOR KFXX, GREEN VALLEY, AZ.								
K280CE CPM	South Tucson, etc. AZ	280D BMPFT870814TF	103.9	.072 DA 1376.0	32-24-54 110-42-56	68.4	109.82 .00	0 TRANS
TRANSLATOR FOR KFXX, GREEN VALLEY, AZ.								
KQEZFM LIC	Coolidge AZ	280A BLH810305AC	103.9	3.00 91.0	33-02-16 111-30-59	13.7	112.06 81.06	31 CLEAR

\*\* End of separation study for channel 277A \*\*

# EXHIBIT 3

Hatfield & Dawson  
Consulting Engineers  
Seattle, Washington

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## FM WITHIN 10.0 KILOMETERS STUDY

Job Title :FM Channels at Cananea

FCC DB Date : 03/30/93

Minimum Channel 200 ( 87.9 MHz)  
Maximum Channel 300 (107.9 MHz)

Coordinates : 30-58-57 110-18-01  
FM Records Sorted by Channel

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Distance kilometers
	Cananea SO		218A 91.5	.0	30-57-43 110-19-01	214.8	2.79
	MEXICAN PROPOSAL						
	Cananea SO		249A 97.7	.0	30-58-15 110-18-01	180.0	1.30
	MEXICAN PROPOSAL						
	Cananea SO		272B 102.3	.0	30-58-57 110-18-01	.0	.00
	Cananea SO		276B 103.1	.0	30-58-57 110-18-01	.0	.00
	Cananea SO		280B 103.9	.0	30-58-57 110-18-01	.0	.00
	Cananea SO		284B 104.7	.0	30-58-57 110-18-01	.0	.00

\*\* End of FM within study \*\*

**CERTIFICATE OF SERVICE**

I, Magdalene E. Copp, a secretary of the law office of Ross & Hardies, do hereby certify that I have this 21st day of May, 1993, served by first-class mail, postage pre-paid, a copy of the foregoing "Counter Proposal of Golden State Broadcasting Corporation and Response to Order to Show Cause" to:

Mr. Ted Tucker  
President  
Desert West Air Ranchers Corporation  
P.O. Box 36717  
Tucson, Arizona 85740

By: Magdalene E. Copp  
Magdalene E. Copp